

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 1:21-cr-40

CHRISTOPHER ALLAN BODEN, a/k/a “Captain,”
LEESA BETH VOGT, a/k/a “Lis Bokt,”
a/k/a “Moose,” and
DANIEL REYNOLD DEJAGER,
a/k/a “Daniel Reynold,” a/k/a “Daniel Miester,”
a/k/a “Danichi,”

HON. ROBERT J. JONKER
Chief United States District Judge

Defendants.

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LOCAL CRIMINAL RULE 12.4 CERTIFICATE

In accordance with L. Crim. R. 12.4 and Administrative Order No. 18-RL-85, the government conferred with defense counsel regarding the topic of the motion via email and in person. Specifically, on February 26, 2021, the government sent defense counsel its proposed protective order. Counsel for Ms. Vogt, Mr. Borgula, exchanged emails with the undersigned regarding the defense concerns about the proposed order, as explained further in the government’s motion. Mr. Borgula indicated that he was taking the lead for the three defense counsel in negotiating the protective order. (Messrs. Lennon and Purtzer were copied on the emails between Mr. Borgula and the government, but neither personally responded.) The government and Mr. Borgula also conferred in person regarding the protective order on March 8, 2021, prior to the arraignment and initial pretrial conference, and agreed to confer further. On

March 9, 2021, Mr. Borgula informed the government that he believed the parties were at an impasse, and the government agrees, necessitating this motion.

Respectfully submitted,

ANDREW BYERLY BIRGE
United States Attorney

Dated: March 10, 2021

/s/ Justin M. Presant
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